



South Stony Island Avenue
Chicago, IL 60617
773.646.6202
Fax 773.646.6381

US EPA RECORDS CENTER REGION 5



1000472

Via Federal Express

May 15, 2012

Mr. Theodore J. Dragovich, P.E.
Illinois Environmental Protection Agency
Bureau of Land – Permit Section
1021 North Grand Avenue East
Springfield, IL 62702

Subject: RCRA Closure of Tank System and Container Storage Areas
RCRA Log B-16R

Dear Mr. Dragovich:

Clean Harbors Services, Inc. (CHSI) is submitting written notification of its intent to close tank system and container storage areas to commence in 45 days. This notification covers the following units:

Flammable Storage Tank Farm – Unit 16
Container Storage Building – Unit 25
Ignitable Container Management Building – Unit 26
Container Handling Dock – Unit 61
Truck Staging Area – Unit 59
Truck Unloading Platform – Unit 15
Truck Pad – Unit 62
Rail Car Unloading Area – Unit 13

The above include all existing RCRA units at the facility.

CHSI will follow the approved Closure Plan from the RCRA Part B Permit Application and the RCRA Part B Permit with one exception. Closure involves waste and residue removal, inspecting, photographing, cleaning, and rinsing. This would be followed by Professional Engineer certification that the cracks, gaps or other defects are not present to allow waste to migrate through to the underlying soil. Otherwise, sampling in accordance with an approved sampling plan would be conducted to verify underlying soil is uncontaminated. The CHSI facility has undergone a RCRA Facility Investigation that has found soil contamination at the facility. IEPA has approved a plan of corrective action to leave the contaminated soil in place through use of an engineered barrier, diversion of groundwater and a deed restriction. All of the above units are part of the engineered barrier in the Corrective Action Plan. For this reason, CHSI is proposing that

Mr. Theodore J. Dragovich, P.E.
May 15, 2012
Page 2


any cracks, gaps or other defects found in containment area floors be repaired and left as part of the engineered barrier. The engineered barrier is required to be maintained in the future. Specifics of the maintenance procedures are included in the Corrective Measures Report Phase II now under review by the IEPA office. This option was discussed with Jim Moore and Mark Schollenberger of the IEPA staff on a conference call December 14, 2011.

As part of this notification, CHSI is submitting a sampling and analysis plan to be used to demonstrating a tank system or storage area has been properly decontaminated.

CHSI will also move any required regulatory records for storage to another location for at least three years from the date of such record.

If you have any questions concerning this notification or require additional information, please contact me at (773) 646-6202, x233.

Sincerely,



James R. Laubsted
Sr. Facility Compliance Manager

Cc: Mr. James Blough
U.S. Environmental Protection Agency
Region V - Mail Code DW-8J
77 West Jackson Boulevard
Chicago, IL 60604

Mr. Kevin Laberge
Chicago Dept. of Environment
30 North LaSalle Street
Suite 200
Chicago, IL 60602-2575

Mr. Anthony G. Ianello
3600 E. 95th Street
95th & the Lakefront
Chicago, IL 60617

CHSI RCRA CLOSURE SAMPLING AND ANALYSIS PLAN

Following waste and residue removal, steam cleaning and triple rinse, rinsate from all tank systems and concrete containment surfaces will be sampled and analyzed for all the hazardous constituents listed in 35 Ill. Adm. Code 721, Appendix H associated with the hazardous wastes which were managed in the Hazardous Waste Management Unit. If the analysis detects the presence of any constituent of listed hazardous waste(s) managed in the unit above the PQL, then waste material should be managed as a listed hazardous waste. CHSI may decide to not analyze specific compounds, but will manage the waste with the corresponding hazardous waste code(s). In addition, an analysis of this waste material will be performed to determine if it exhibits any of the characteristics of hazardous waste as set forth in 35 Ill. Adm. Code 721, Subpart C. Waste material exhibiting any characteristic of a hazardous waste must also be managed as a hazardous waste. Decontamination of the unit will be deemed complete when the rinsate no longer exhibits any characteristic of hazardous waste. Rinsate may be treated in the on-site CHSI wastewater treatment plant if that the rinsate is compatible with the WWTP waste and introduction of rinsate into the WWTP would not be in violation of any permit.

Hazardous constituents listed in 35 Ill. Adm. Code 721, Appendix H associated with the hazardous wastes which were managed in each Hazardous Waste Management Unit are considered to be those constituents listed with the following USEPA Hazardous Waste Codes in Appendix H:

1. Acids – D002, D004-D011, F006, F019, K002-K008, K031, K048-K052, K061, K062, K069, K084, K086, K100-K102, K106, P011, P012, U144-U146, and U246.
2. Alkalines - D002, D004-D011, F006, F019, K002-K008, K031, K048-K052, K061, K062, K069, K084, K086, K100-K102, K106, P011, P012, U144-U146, and U246.
3. Flammables/organics –D001, D002, D004-D043, F001-F005, F039, K001, K009-K030, K032-K043, K051, K052, K060, K073, K083, K085, K086, K093-K099, K103-K105, P004, P005, P022, P037, P048, P050, P051, P059, U001-U007, U009, U012, U018-U019, U022-U024, U027-U028, U031-U033, U036-U039, U042-U044, U046, U048, U050-U052, U055-U057, U060-U061, U063-U086, U088, U091-U092, U094-U095, U098-U106, U108-U109, U112-U113, U120, U122-U124, U127-U135, U137, U140, U144-U147, U151, U154, U157, U159-U161, U165-U171, U182-U186, U188-U190, U196, U204-U220, U223-U234, U239-U247, U328-U359.
4. Oxidizers – D001
5. Poisons/Pesticides – D012-D017, D020, D031, P003-P004, P010-P012, P028, P031-P033, P050-P051, P059, P105, P110, P120-P123.

6. Reactives –D003, F006, F007-F012, F019, P006, P013, P021, P029, P030, P042, P063, P065, P074, P081, P098, P099, P104, P106, P112, P122, U006, U020, U023, U033, U096, U133, U160, U189, U205, U223, and U234.

Note 35 Ill. Adm. Code 721, Subpart C analysis will be run on all rinsate samples.

A final rinsate sample will be taken from each bay of a container storage area, tank and tank storage containment area. The number of samples to be analyzed for each unit (bay) and analyses to be run are:

Container Storage Building (Unit 25) – 1 sample each: Alkaline/Poison (Alkaline, Poison/Pesticides), Acids (Acids), Flammable (Flammables/organics, PCBs), Truck Pad (Alkaline, Poison/Pesticides, Acids, Flammables/organics)
Ignitable Container Management Building (Unit 26) - 1 sample (Flammables/organics)
Container Handling Dock (Unit 61) - 1 sample (Flammables/organics)
Truck Staging Area (Unit 59) - 1 sample (Flammables/organics)
Truck Unloading Platform (Unit 15) - 1 sample (Flammables/organics)
Truck Pad (Unit 62) - 1 sample (Flammables/organics)
Rail Car Unloading Area (Unit 13) - 1 sample (Flammables/organics)
Flammable Storage Tank Farm (Unit 16) - 10 tank samples, 10 containment samples (Flammables/organics)

If the analysis detects the presence of any constituent of hazardous waste(s) managed in the unit above the PQL or CHSI decides to not analyze any constituent of hazardous waste(s), then the waste material will be managed as a hazardous waste with the corresponding hazardous waste code. All equipment (piping, pumps, etc.) rinsate will be managed using the same criteria above according to the unit associated with the equipment.

CHSI may elect to remove equipment and dispose offsite without decontamination or analysis. Any equipment disposed of this way would carry all hazardous waste codes for that area listed above.

No sampling will be done of containment structures that are part of the final engineered barrier in the Corrective Action Plan. Any cracks, gaps or other defects found will be repaired and left as part of the engineered barrier.



State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

USEPA

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217524-3300

October 30, 1996

CERTIFIED MAIL
Z 363 621 073

Mr. Paul Ahearn
Clean Harbors Environmental Services, Inc.
1501 Washington Street, P.O. Box 850327
Braintree, Massachusetts 02185-0327

Re: 0316000051 -- Cook County
Clean Harbors of Chicago, Inc.
ILD000608471
Date Received: August 30, 1996
Log No. C-771
RCRA Closure

Dear Mr. Ahearn:

This letter is in response to the Addendum Report for Unit 49 Outdoor Container Storage Areas West and Northwest of Tank Farm dated August 29, 1996 which you submitted. This report, along with a report which you submitted October 27, 1995, contained information regarding RCRA closure of two Outdoor Hazardous Waste Container Storage Areas located west and northwest of the Bulk Storage Tank Farm (the West and Northwest Units) at the above-referenced facility.

The activities documented in these reports meet the closure requirements of 35 Ill. Adm. Code 725, Subpart G and thus these reports constitute an approved closure plan for the subject units. Furthermore these reports contained a Certification Statement, signed by Brian J. Clarke, Vice President and General Counsel for CWM Chemical Services, and Kenneth A. James, P.E., the overseeing independent registered professional engineer, indicating that the activities described in these reports had indeed been completed. Mr. Clarke is a representative of CWM Chemical Services, the owner/operator of the site at the time closure of these units was carried out.

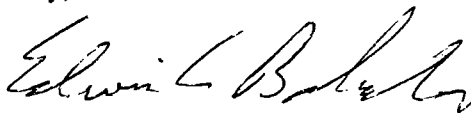
On December 15, 1995 a representative of the Agency's Field Operations Section performed a closure inspection of the West and Northwest Units which revealed that they appeared to be closed in accordance with Agency requirements. Thus, based upon a review of the reports referenced above and this inspection, the Agency hereby determines that the West and Northwest Hazardous Waste Container Storage Areas have been closed in accordance with 35 Ill. Adm. Code 725. As such, no additional closure activities are required at the subject outdoor container storage areas at this time.

The above determination that the West and Northwest Hazardous Waste Containers have been closed in accordance with 35 Ill. Adm. Code 725 is subject to the following conditions and modifications:

1. The determination of closure completion is dependent, in part, on the fact that the West and Northwest Units may be subject to additional investigation and possible corrective measures under Section V, Corrective Action, of the revised RCRA permit issued to Clean Harbors of Chicago, Inc. On June 30, 1995 (Log Nos. B-16-M-2 and B-16-M-4). This is consistent with the closure activities already completed or proposed under IEPA Log Nos. C-742 and C-759.
2. Except as modified herein, operation of the Clean Harbors of Chicago, Inc. facility shall be carried out in accordance with the RCRA permit issued to the facility on June 30, 1995 (Log Nos. B-16-M-2 and B-16-M-4).
3. For future reference please note that photographs should be taken prior to, during and after completion of closure and corrective action activities in order to adequately document them.

Should you have any questions regarding this letter, please contact Tom Fiersten at 217/524-3311.

Sincerely,



Edwin C. Bakowski, P.E.
Manager, Permit Section
Bureau of Land

ECB:TF\mls\96642.WPD
-km

cc: USEPA, Region V -- Hak Cho



State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

USEPA

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/524-3300

August 20, 1996

CERTIFIED MAIL

Z 363 613 799

Mr. Paul Ahearn
Clean Harbors Environmental Services, Inc.
1501 Washington Street, P.O. Box 850327
Braintree, Massachusetts 02185-0327

Re: 0316000051 -- Cook County
Clean Harbors of Chicago, Inc.
ILD000608471
Date Received: July 15, 1996
Log No. C-742
RCRA Closure

Dear Mr. Ahearn:

This letter is in response to the Addendum Report for Building 26-43 Conveyer Area & Fire Suppression System dated July 12, 1996 which you submitted. This report was submitted in partial response to the April 11, 1996 Agency letter regarding various closure and construction activities at the former CWM Chemical Services portion of the above referenced facility located at 11700 South Stony Island Avenue. Specifically, this submittal contained information documenting activities to: (1) complete closure of the Conveyer Between Buildings 26 and 43; and (2) install the Fire Suppression System Pipeline.

It appears as if the activities documented in the subject submittal to complete closure of the Conveyer Between Buildings 26 and 43 are acceptable. The information provided in the subject submittal; the Closure Documentation Report for Decontamination/Closure Activities at CWM Chemical Services, Inc. dated June 29, 1995; and your November 13, 1995 letter adequately documents the decontamination and/or closure of the following hazardous waste management units (HWMUs) approved under Closure Log No. C-742:

- Unit No. 1 Bulk Storage Tanks T-108;
- Unit No. 2 Bulk Storage Tank T-111;
- Unit No. 3 The Bulk Storage Tank Farm Piping, Pumps and Ancillary Equipment;
- Unit No. 4 The Building 43 Primary Drum Shredder;

- Unit No. 5 The Building 43 Drum Crusher Unit;
- Unit No. 6 The Building 26 Secondary Shredder;
- Unit No. 7 Ancillary Equipment Associated with Units 1 through 6;
- Unit No. 8 The Building 26 Roller Conveyor Unit;
- Unit No. 9 Bulk Storage Tanks T-101 through T-107, T-109, T-110 and T-112;
- Unit No. 10 The Tank Farm Secondary Containment Structure;
- Unit No. 11 Building 25;
- Unit No. 12 Building 26;
- Unit No. 13 Building 43;
- Unit No. 14 Area 38 - the Old CWM-CS Ash Pad; and
- Unit No. 15 The Conveyor Between Buildings 26 and 43.

As stated in Item 6 of the subject submittal, CWM Chemical Services was the owner/operator of the site at the time that decontamination/closure of the units under Log No. C-742 took place. The closure certification statement submitted with the original July 29, 1995 closure documentation report is acceptable. This certification statement was signed by Brian J. Clarke, Vice President and General Counsel for CWM Chemical Services, and Kenneth A. James, P.E., the overseeing independent registered professional engineer. On July 27, 1995 a representative of the Agency's Field Operations Section performed a closure inspection of the above units which revealed that they were decontaminated and/or closed in accordance with the approved closure plan. No additional decontamination or closure activities are required at these units at this time.

As indicated above, information was also provided in the subject submittal to document the management of wastes generated during the installation of the Fire Suppression System Pipeline. The Fire Suppression System was installed in accordance with recommendations given in the November 23, 1993 Final HAZOP Report prepared by Technica for CWM Chemical Services, and as required by the revised RCRA Permit issued by the Agency on June 30, 1995 (Log No. B-16-M-2). Information provided in the subject submittal indicates that wastes generated as a result of the installation of the Fire Suppression System were managed in an appropriate manner and no additional action will be necessary at this time regarding this issue.

Clean Harbors of Chicago, Inc.
Log No. C-742
Page 3

It should be noted that the above listed HWMUs and the area of the Fire Suppression System may be subject to additional investigation and possible corrective measures under Section V, Corrective Action, of the revised RCRA permit issued for the operation of the subject facility.

As requested in the cover letter for the subject submittal, the Revised Closure Documentation Report for the Two Outdoor Container Storage Areas Located Near the Bulk Storage Tank Farm required by the April 11, 1996 Agency letter should be submitted to the Agency by August 30, 1996.

Should you have any questions regarding this letter, please contact Tom Fiersten at 217/524-3311.

Sincerely,



Edwin C. Bakowski, P.E.
Manager, Permit Section
Bureau of Land

ECB:TF:bjh\961451.WPD

cc: USEPA, Region V -- Hak Cho



State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

USEPA,
TSCA
A. Mantig

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/524-3300

March 20, 1996

Mr. Paul A. Ahearn
Clean Harbors Environmental Services
325 Wood Road, P.O. Box 327
Braintree, Massachusetts 02184

Re: 03160000051 -- Cook County
Clean Harbors of Chicago
ILD000608471
Log No.: B-16-M-2
Received: February 5, 1996
RCRA Permit

Dear Mr. Ahearn:

This letter is in response to the February 2, 1996 Closure Cost Estimate for the closure/decontamination of the hazardous waste incinerator and associated hazardous waste storage and staging areas (Closure Log No. C-759) located in the CWM Chemical Services incinerator process area at the 11700 South Stony Island Avenue portion of the Clean Harbors of Chicago facility. This cost estimate was submitted in accordance with Attachment H, Condition I.B.3 of the final RCRA permit issued to Clean Harbors of Chicago, Inc.

After review of the subject closure cost estimate, the Agency has determined that costs for additional closure activities should have been included in the estimate provided by you. Clean Harbors must prepare and submit a revised cost estimate to the Agency or provide justification as to why costs for these additional closure activities should not be included in the cost estimate by April 15, 1996. The sections of the revised cost estimate presented below should address costs for the following activities:

2.0 Preconstruction Stage

1. The estimated cost for wipe samples of equipment should include laboratory analysis and quality control costs as well as costs for transporting samples between the site and the laboratory.

3.0 Construction Demolition Phase

1. Transportation costs for transportation of non-contact equipment for scrap should be included in the cost estimate.
2. An estimate of the quantity of contact equipment that will be shipped off-site for disposal should be included. The transportation, unit, and estimated total costs for disposal of this equipment as TSCA/RCRA regulated hazardous waste should be included.

3. An estimate of the quantity of equipment shipped off-site for treatment, i.e. macro-encapsulation, prior to disposal should be included. The transportation, unit, and estimated total costs for treatment of this equipment should be included.
4. Unit and estimated total costs associated with disposal/incineration of liquids drained from the contact equipment, and rubber and porous material, e.g. gaskets, seals, refractory, etc., removed from the incinerator should be included.

4.0 Concrete/Asphalt Foundations and Structures Underlying the Incineration System Units Undergoing Closure

1. Unit and estimated costs for disposal of concrete/asphalt foundations and structures should be included. An estimate of the quantity of this material that will be generated should also be provided. This material should be disposed as TSCA/RCRA regulated waste unless decontaminated and waste analysis shows that the waste is non-hazardous.
2. Decontamination and waste characterization costs should be included if the above option is pursued.

5.0 Hazardous Waste Container Storage/Staging Areas (S01 units)

1. The estimated excavation costs should be included.
2. Unit and total disposal costs for asphalt and soil removed from the hazardous waste container storage/staging areas should be provided. This material should be disposed as TSCA/RCRA regulated waste.
3. Unit and total soil sampling/analysis costs should be included for confirmatory grid sampling which will be conducted.

6.0 Underground Stormwater Collection System

1. An estimate of the quantity of waste that will be generated during the clean out of the underground stormwater collection system should be included.
2. The estimated costs of managing and transporting this material prior to disposal should be included.
3. Sampling/analysis costs to characterize this waste for disposal should be included.
4. The unit and total costs for disposal of this material should be included.

7.0 Quality Control/Assurance

1. Laboratory quality control/quality assurance costs should be included .

In addition to the above cost estimates, an estimate of costs for decontamination of equipment and structures associated with closure activities should be provided. This estimate should include costs for characterization, transportation and disposal of decontamination wastes. The costs associated with providing personal protective equipment for workers and institution of the closure site safety plan should also be included.

Should you have any questions concerning the requirements of this letter please contact Tom Fiersten, at 217/524-3311.

Sincerely,

Edwin C. Bakowski
by JHK

Edwin C. Bakowski, P.E.
Manager, Permit Section
Bureau of Land

ECB:TFF\mls\963059.WPD

cc: USEPA Region V - Hak Cho
USEPA Region V - Anton Martig



State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

Rejo USEPA
G. Nanger

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/524-3300

January 25, 1996

Mr. Paul A. Ahearn
Clean Harbors Environmental Services
325 Wood Road
Braintree, Massachusetts 02184

Re: 03160000051 -- Cook County
Clean Harbors of Chicago
ILD000608471
Log No.: C-759
Received: October 3, 1995
RCRA Closure

Dear Mr. Ahearn:

This letter is in response to the October 2, 1995 Proposed Decontamination/Closure Plan prepared and submitted by Clean Harbors Environmental Services. The subject submittal was reviewed as an interim status partial closure plan submitted in accordance with Attachment D of Condition C.2 of the RCRA Part B Permit issued to the facility June 30, 1995 (Log No. B-16-M-2). The subject submittal proposes closure activities for some of the hazardous waste management units (HWMUs) located in the former CWM Chemical Services incinerator process area at the 11700 South Stony Island Avenue portion of the Clean Harbors of Chicago facility.

The subject interim status partial closure plan is hereby approved subject to the following conditions and modifications:

1. The following units are addressed in the subject decontamination/closure plan:
 - a. Hazardous Waste Incineration System (T03 unit):
 - (1) Rotary Kiln (Unit 19) and Ancillary Equipment;
 - (2) Secondary Combustion Chamber (Unit 20);
 - (3) Overhead Pipe Rack (Unit 18) running from:
 - (a) the Secondary Combustion Chamber to the Tank Farm and
 - (b) the Secondary Combustion Chamber to the Control Room;
 - (4) Air Pollution Control System (Unit 21);

- (5) Stack Monitoring Building (Unit 34); and
- (6) Concrete/Asphalt Foundation and Structures Underlying the Incineration System Units Undergoing Closure;
- b. Hazardous Waste Container Storage/Staging Areas (S01 units):
 - (1) Kiln Staging Areas (Unit 45):
 - (a) South of the Rotary Kiln and
 - (b) South of the Secondary Combustion Chamber;
 - (2) Truck Staging Area (Unit 48);
 - (3) Outdoor Container Storage Areas (Unit 49):
 - (a) North of the Air Pollution Control System and
 - (b) East of Building 43; and
 - (4) Ash Hopper Staging Area (Unit 54);
- c. Underground Stormwater Collection System; and
- d. Process Wastewater Treatment System:
 - (1) Neutralizing Area (Unit 22);
 - (2) Effluent Treatment Building (Unit 23);
 - (3) Lamella Settlers (Unit 24); and
 - (4) Filter Building (Unit 42).

These units are shown in Figure 1 of the subject submittal.

2. Closure activities should be completed by April 1, 1997. When closure is complete, the owner or operator should submit to the Agency certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. This certification should be received at this Agency within sixty (60) days after closure, or by June 1, 1997. These dates may be revised if Clean Harbors finds that additional time is necessary to complete all required closure activities and demonstrates to the Agency that it is attempting to complete closure in a timely manner.

The attached closure certification form should be used. Signatures should meet the requirements of 35 Ill. Adm. Code 702.126. The independent engineer should be present at all critical, major points (activities) during the closure. These might include soil sampling, soil removal, backfilling, final cover placement, etc. the frequency of inspections by the independent engineer should be sufficient to determine the adequacy of each critical activity. Financial assurance must be maintained for the units approved for closure herein until the Agency approves the facility's closure certification.

The Illinois Professional Engineering Act (Ill. Rev. Stat., Ch. 111, par. 5101 et. seq.) requires that any person who practices professional engineering in the State of Illinois or implies that he (she) is a professional engineer must be registered under the Illinois Professional Engineering Act (par. 5101, Sec. 1). Therefore, any certification or engineering services which are performed for a closure plan in the State of Illinois must be done by an Illinois P.E. Plans and specifications, designs, drawings, reports, and other documents rendered as professional engineering services, and revisions of the above should be sealed and signed by a professional engineer in accordance with par. 5119, sec. 13.1 of the Illinois Professional Engineering Act.

In order to document the closure activities at your facility, a Closure Documentation Report should be submitted with the closure certification statement. The closure documentation report should be prepared in accordance with the attached GUIDANCE FOR PREPARING THE CLOSURE DOCUMENTATION REPORT FOR THE CLOSURE OF THE CWM CHEMICAL SERVICES HAZARDOUS WASTE INCINERATOR AND STORAGE/STAGING AREAS AT THE CLEAN HARBORS OF CHICAGO FACILITY (Log No. C-759).

The original and two (2) copies of all certifications, logs, or reports which are required to be submitted to the Agency by the facility should be mailed to the following address:

Illinois Environmental Protection Agency
Bureau of Land -- #33
Permit Section
2200 Churchill Road
Post Office Box 19276
Springfield, Illinois 62794-9276

3. The approval of this decontamination/closure plan for the above referenced units does not approve, disapprove, or supersede any other closure plans as they relate to the remaining hazardous waste management units located at the 11700 South Stony Island Avenue (former CWM Chemical Services incinerator) portion of the Clean Harbors of Chicago facility. Each unit addressed in the decontamination/closure plan may be subject to additional investigation and corrective measures as specified in the Corrective Action portion of the RCRA Part B Permit issued to the facility June 30, 1995 (Log No. B-16-M-2).
4. Decontamination/closure activities proposed in the subject submittal at the units associated with the Hazardous Waste Incineration System identified in Condition 1.a above are acceptable to the Agency subject to the following conditions:
 - a. Equipment such as stairs, platforms, piperacks, etc. that did not come into contact with hazardous wastes or hazardous constituents are not subject to RCRA decontamination requirements. A general listing of non-contact equipment removed during closure activities and a general description of how this equipment was managed should be provided in the closure documentation report;
 - b. Decontamination of the units, equipment, or structures associated with the Hazardous Waste Incineration System used to manage hazardous waste and/or hazardous constituents is not necessary if the units, equipment, or structures are disposed in a permitted TSCA/RCRA authorized landfill or incinerator. If this manner of disposal is chosen, the material must comply with all TSCA/RCRA requirements (e.g., "land-ban" treatment standards) prior to disposal;
 - c. The proposed PCB cleanup procedures and objectives for the above units are acceptable to the Agency. The final solvent rinse from the decontamination of all nonporous surfaces exposed to hazardous wastes/hazardous constituents should achieve the objective of 4 mg/l PCBs to be considered TSCA decontaminated. Alternative cleanup objectives may be used if approved by USEPA. If alternative cleanup objectives are used, then the rationale for their use and any limitations should be explained in the closure documentation report;
 - d. Following decontamination to meet the TSCA closure standard pursuant to 40 CFR 761, all surfaces of equipment and structures associated with the above units which were exposed to hazardous wastes or hazardous constituents should be pressure washed with a detergent solution and rinsed. This additional decontamination effort will achieve compliance with the RCRA closure standard for decontaminating structures potentially contaminated with hazardous wastes/hazardous constituents;

- e. All piping and ancillary equipment associated with the Hazardous Waste Incineration System decommissioned as part of this closure effort must be decontaminated prior to re-use or sending for metals reclamation. In order to meet RCRA closure requirements, this decontamination effort shall consist of (1) removal of any gross contamination, (2) washing the exterior with a detergent solution, (3) flushing the interior with a detergent solution, and (4) final rinsing with clean water;
 - f. Decontamination of piping and ancillary equipment associated with closure activities is not necessary if such equipment is disposed in a permitted TSCA/RCRA authorized landfill or incinerator. If this manner of disposal is chosen, these materials must comply with all TSCA/RCRA requirements (e.g., "land-ban" treatment standards) prior to disposal;
 - g. Wipe sampling for PCBs associated with the decontamination/closure of the above units should be done in accordance with Condition 10 below; and
 - h. A summary of equipment and structures associated with each of the individual units and the corresponding decontamination/closure action taken should be provided in the Closure Documentation Report required in Condition 2 above. This summary should include the final fate of each piece of equipment or structure.
5. Decontamination/closure activities proposed in the subject submittal for concrete pads or structures associated with the Hazardous Waste Container Storage Area units identified in Condition 1.b above and the concrete/asphalt foundations and structures underlying the incineration system units undergoing closure are acceptable to the Agency subject to the following conditions:
- a. Decontamination of concrete pads and structures to meet TSCA requirements will also achieve compliance with the RCRA decontamination/closure standard for structures potentially contaminated with hazardous wastes or hazardous constituents;
 - b. If preliminary wipe sampling results demonstrate that TSCA decontamination is not necessary, then concrete pads and structures left in place may be decontaminated by either pressure washing or steam cleaning with a detergent solution, and triple rinsing to achieve compliance with RCRA decontamination/closure requirements;
 - c. Any concrete surfaces that are broken up and disposed should be managed in accordance with Condition 6 below regarding concrete/asphalt removal and soil excavation; and

- d. Wipe sampling for PCBs associated with the decontamination/closure of the above units should be done in accordance with Condition 10 below.
6. Asphalt/concrete removal and soil excavation activities proposed in the subject submittal for the Hazardous Waste Container Storage Area units identified in Condition 1.b above are acceptable to the Agency subject to the following conditions:
- a. Soil sampling and analysis to determine proper waste characterization of excavated material (asphalt, concrete, soil, etc.) or to confirm that the extent of contamination has been addressed should be conducted in accordance with Condition 11 below. Material excavated from the above units with PCB concentrations greater than 25 mg/kg must be managed as TSCA waste pursuant to 40 CFR 761. All other excavated material should be managed as 35 Ill. Adm. Code Part 721 F001-F003, U169, and U019 hazardous waste in accordance with 35 Ill. Adm. Code 722, 723, 728 and 809, as well as all applicable federal requirements. The results of the sampling and analysis of shallow soils must be documented in accordance with Condition 12 below.
 - b. Should it be determined that the remaining soil underlying the above units are contaminated, additional investigative efforts may be coordinated with the corrective action activities for the former CWM Chemical Services Incinerator Process Area. Should Clean Harbors pursue this option, the Agency must be notified in writing within the Closure Documentation Report required in Condition 2 above;
 - c. Onsite stabilization of excavated soil may be conducted as proposed in the subject Decontamination/Closure Plan if necessary to meet applicable 40 CFR 268 land disposal treatment standards;
 - d. To avoid creating another regulated storage unit during closure, it is recommended that the necessary permits for waste disposal are obtained prior to initiating excavation activities. It will be necessary to obtain an Illinois Waste Stream Permit Authorization for all excavated soil transported off-site for disposal at the CWM-CID #1 hazardous waste landfill prior to disposal. If it is necessary to store excavated hazardous waste on-site prior to off-site disposal, do so only in containers or tanks for less than ninety (90) days. Do not create regulated waste pile units by storing the excavated hazardous waste in piles. The ninety (90) day accumulation time exemption (35 IAC 722.134) only applies to containers and tanks;
 - e. If it is determined that soil excavation and off-site disposal is not the preferred remedial action to be taken at the above units, then the Agency must be notified in writing when such a determination is made. At that time, additional guidance will be

provided regarding the information which must be submitted to the Agency for review and approval relative to the alternative remedial action which the facility would like to implement; and

- f. Scaled drawings showing the horizontal and vertical extent of excavations at and quantities of material removed from each unit should be provided in the Closure Documentation Report required in Condition 2 above.
7. The proposed decontamination/closure activities at the Underground Stormwater Collection System are acceptable to the Agency. All sampling associated with the decontamination/closure of the Underground Stormwater Collection System should be carried out in accordance with Condition 11 below.
8. The Process Wastewater Treatment System identified in Condition 1.d above appears to be exempt from the requirements of 35 IAC 724 and 725 because it is a wastewater treatment unit as defined in 35 IAC 720.110 (see 35 IAC 703.123). Thus, closure activities are not required for these units. However, the units comprising the Process Wastewater Treatment System may be subject to future investigation and corrective measures as specified in the Corrective Action portion of the facility's RCRA Part B Permit.
9. All wastes generated and/or derived from the subject decontamination/closure activities at the site (e.g., decontamination wash and rinse waters, personal protective equipment, etc.) meet the definition of Pollution Control Waste and Industrial Waste in accordance with 35 Ill. Adm. Code Part 809, and therefore are subject to regulation as Special Wastes. Clean Harbors must collect these wastes for adequate characterization to determine if these wastes are listed or characteristically hazardous wastes, including a determination of whether these wastes are "derived-from" hazardous wastes. If it is determined that these wastes are indeed hazardous, they must be managed in accordance with the applicable requirements of 35 Ill. Adm. Code Subtitle G. If these wastes are determined to be non-hazardous, they must be managed as special waste in accordance with 35 Ill. Adm. Code Subtitle G.
10. All wipe samples collected must be conducted in accordance with SW-846 or equivalent procedures. All quality assurance/quality control protocol as required under SW-846 for such sampling must be followed, including proper sample collection preservation, handling and transportation, including chain-of-custody. All wipe samples collected must be analyzed in accordance with Condition 11 below.
11. All soil samples should be analyzed individually (i.e., no compositing). Analytical procedures should be conducted in accordance with Test Methods for Evaluating Solid Wastes, Third Edition (SW-846). When a SW-846 (Third Edition) analytical method is specified, all the chemicals listed in the Quantitation Limits Table for that method should be reported unless specifically exempted in writing by the Agency. Apparent visually contaminated material within a sampling interval should be included in the sample portion

of the interval to be analyzed. To demonstrate a parameter is not present in a sample, analysis results must show a detection limit at least as low as the PQL for that parameter in the third edition of SW-846. For inorganic parameters, the detection limit must be at least as low as the RCRA Groundwater Detection Limits, as referenced in SW-846 (Third Edition) Volume 1A, pages TWO-29 and TWO-30, Table 2-15. If possible, your sampling program should be extensive enough to determine the lateral and vertical extent of contamination to the detection limit (PQLs) referenced above.

All soil samples collected must be analyzed for PCBs by SW-846 Method 8080. All soil samples collected for waste stream characterization must be analyzed for 35 Ill. Adm. Code Part 724, Appendix I constituents.

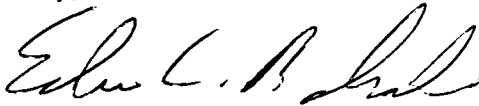
12. The results of all decontamination wipe sampling and analysis and soil sampling and analysis should be documented in the Closure Documentation Report in accordance with Item 2.5.4 of the attached GUIDANCE FOR PREPARING THE RCRA CLOSURE DOCUMENTATION REPORT FOR THE CLOSURE OF THE CWM CHEMICAL SERVICES HAZARDOUS WASTE INCINERATOR AND STORAGE/STAGING AREAS AT THE CLEAN HARBORS OF CHICAGO FACILITY (Log No. C-759).
13. Quality assurance/quality control procedures which meet the requirements of SW-846 must be implemented during all required sampling/analysis efforts, including wipe sampling/analysis procedures. Along with the sampling and analysis report required in accordance with Condition 12 above, Clean Harbors must submit a completed copy of the laboratory certification document, provided as an attachment to this letter, for these analytical events.
14. If the Agency determines that implementation of this closure plan fails to satisfy the requirements of 35 Ill. Adm. Code, Section 725.211 and 725.214, the Agency reserves the right to amend the closure plan. Revisions of closure plans are subject to the appeal provisions of Section 40 of the Illinois Environmental Protection Act.
15. Under the provisions of 29 CFR 1910 (51 FR 15,654, December 19, 1986), cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of 40 hours of safety and health training off site plus a minimum of three days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations.

16. Please be advised that the requirements of the Responsible Property Transfer Act (Public Act 85-1228) may apply to the Clean Harbors of Chicago facility due to the management of RCRA hazardous waste. In addition, please be advised that if you store or treat on-site generated hazardous waste in containers or tanks pursuant to 35 IAC 722.134, those units are subject to the closure requirements identified in 35 IAC 722.134(a)(1).
17. All hazardous wastes that result from this project are subject to annual reporting as required in 35 IAC 722.141 and should be reported to the Agency by March 1 of the following year for wastes treated and left on-site or shipped off-site for storage, treatment and/or disposal during any calendar year. Additional information and appropriate report forms may be obtained from the Agency by contacting:

Facility Reporting Unit
Bureau of Land
Illinois Environmental Protection Agency
2200 Churchill Road
P.O. Box 19276
Springfield, Illinois 62794-9276.

Should you have any questions concerning this matter, please contact Tom Fiersten, at 217/524-3311.

Sincerely,



Edwin C. Bakowski, P.E.
Manager, Permit Section
Bureau of Land

ECB:TF:bjh\95101S.WPD
JVM

Attachments: Closure Certification Statement
Laboratory Certification Statement
Guidance for Preparing the RCRA Closure Documentation Report for the Closure of the CWM Chemical and Storage/Staging Areas at the Clean Harbors of Chicago Facility (Log No. C-759)
RCRA Interim Status Closure and Post-Closure Care Plans General Form (LPC-PA18)

cc: USEPA Region V - George Hamper
USEPA Region V - Anton Martig

ATTACHMENT

This statement is to be completed by both the responsible officer and by the registered professional engineer upon completion of closure. Submit one copy of the certification with original signatures and three additional copies.

Closure Certification Statement

Closure Log C-759

The hazardous waste management units at the facility described in this document have been closed in accordance with the specifications in the approved closure plan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

USEPA ID Number

Facility Name

Signature of Owner/Operator Date

Name and Title

Signature of Registered P.E. Date

Name of Registered P.E. and Illinois
Registration Number

Mailing Address of P.E.:

Registered P.E.'s Seal:

ECB:TF:bjh\95101S.WPD

Laboratory Certification Statement

Closure Log No. C-759

Upon completion of Phase I of the RFI, this statement is to be completed by both a responsible officer of the owner or operator (as defined in 35 IAC 702.126) and (2) a responsible officer (as defined in 35 IAC 702.126) of the laboratory which conducted the chemical analyses required as part of the approved closure plan. The original of this statement shall accompany the original closure certification statement and the Closure Documentation Report.

The sample collection, handling, preservation, preparation and analysis conducted as part of the closure of the hazardous waste management units described in this document has been conducted in accordance with the specifications in the approved closure plan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

USEPA ID Number

Facility Name

Signature of Owner/Operator

Date

Name and Title of Owner/Operator
Representative

Name of Laboratory

Signature of Laboratory
Responsible Officer

Date

Mailing Address of Laboratory:

Name and Title of Laboratory Responsible
Officer

**GUIDANCE FOR PREPARING THE
RCRA CLOSURE DOCUMENTATION REPORT
FOR THE CLOSURE OF THE CWM CHEMICAL SERVICES
HAZARDOUS WASTE INCINERATOR AND STORAGE/STAGING AREAS
AT THE CLEAN HARBORS OF CHICAGO FACILITY
(Log No. C-759)**

1.0 INTRODUCTION

Upon completion of required RCRA closure activities, the owner/operator and overseeing independent registered professional engineer must submit certification that the closure of the hazardous waste management unit(s) were carried out in accordance with the approved closure plan (IEPA Log No. C-759). To support this certification, a report documenting the closure activities is also required. The closure, decontamination, and renovation activities carried out at the old CWM Chemical Services facility (located at 11700 South Stony Island Avenue) since the consolidation of that site with the Clean Harbors of Chicago facility have been somewhat complex in nature. Thus, the required closure documentation report for this closure effort should be a stand alone report providing (1) documentation of the current closure activities, (2) a summary of previous closure, decontamination, and renovation activities, and (3) a history of waste management activities carried out at the site by CWM Chemical Services and Clean Harbors of Chicago. This document has been developed to provide guidance in the preparation of such a closure documentation report.

The closure documentation report should contain the information specified below. The order presented below is suggested as one possible way to format the report, however this format may be altered in order to more clearly present the information.

2.0 RECOMMENDED CONTENTS OF A CLOSURE DOCUMENTATION REPORT

2.1 Introduction to the Closure Documentation Report

A general discussion of the content and goals of the report should be provided in the introductory portion of the closure documentation report. The introduction should also discuss, in general, the old CWM Chemical Services facility and its relationship to the current Clean Harbors of Chicago facility and the hazardous waste management units undergoing closure.

2.2 Facility/Closure Background

A brief summary of the location and current and past operations at the old CWM Chemical Services portion of the facility should be provided in the closure documentation report. At a minimum this section should include:

1. The address of the facility and the township, range, and section in which the facility is located;

2. A scaled drawing of the facility in which the location of all relevant structures are identified, including hazardous waste management units undergoing closure;
3. A description of the waste management activities carried out by CWM Chemical Services when they operated at the site;
4. A description of current and proposed waste management activities at the site; and
5. Identification of waste management units closing and those remaining open;

2.3 Description of Recent Site Activities

Considering the extensive modifications done to the old CWM Chemical Services portion of the current Clean Harbors of Chicago facility, general information regarding preconstruction and closure activities carried out in accordance with the August 16, 1994 (Log No. B-16) and the October 31, 1994 (Log No. C-742) Agency letters should be included in the closure documentation report. This information should be included to provide a history of hazardous waste management units (HWMUs) and other areas that have been closed or modified as a result of the consolidation of the old CWM Chemical Services site with Clean Harbors of Chicago. The following information regarding previous closure, decontamination, and/or renovation activities carried out in accordance with the August 16, 1994 and October 31, 1994 Agency letters should be included in the closure documentation report:

1. The name and EPA process code of each unit that has been closed, decontaminated, or renovated.
2. Descriptions of each unit subject to the above activities including:
 - a. the size/volume capacity of the unit;
 - b. dates of operation;
 - c. construction of the unit;
 - d. how the unit was typically operated;
 - e. closure/decontamination activities carried out at the unit including if and how the unit was disposed, scrapped, or reused; and
 - f. the current use of the unit or area that the unit occupied.

3. A scaled drawing of the facility identifying the units prior to past construction and closure activities;

The above information need not be extremely detailed, but should, at a minimum, provide a narrative summary of and tie together previous closure, decontamination, and preconstruction activities carried out by Clean Harbors at the old CWM Chemical Services portion of the facility.

2.4 Information Regarding Units Closed in Accordance with the Subject Closure Plan (Log No. C-759)

The following information should be provided in the closure documentation report regarding each of the hazardous waste management units that were closed in accordance with the subject closure plan approval letter (Log No. C-759) and associated modifications:

1. Name and EPA process code of the unit.
2. Description of the unit including:
 - a. the size/volume capacity;
 - b. dates of operation;
 - c. construction;
 - d. how the unit was typically operated; and
 - e. an itemized summary and descriptions of associated equipment and structures should be included for individual units associated with the Hazardous Waste Incineration System.
3. Description of the material underlying the unit.
4. Scaled drawing(s) of the unit showing:
 - a. dimensions of the unit;
 - b. drains, sewers, sumps, trenches, and other appurtenant structures associated with the unit and within 15 feet of the unit;
 - c. secondary containment features; and

- d. the unit's spatial relationship to surrounding structures and associated equipment/units.
5. Photographs of the unit identifying the date the photograph was taken and the orientation of the photograph depicted on a scaled drawing.

2.5 Documentation of Closure Activities

A complete and detailed description of all closure activities conducted to demonstrate closure of the hazardous waste management unit(s) was conducted in accordance with the approved closure plan and RCRA closure standards should be provided. At a minimum, the following information must be provided for each unit:

1. Information Regarding Removal of Waste from the Unit - a description of the methods and procedures used to remove all residual wastes remaining in the unit at the time of closure plan approval, including:
 - a. Characterization of all wastes, including the waste name and principal components, referencing the appropriate EPA Hazardous Waste Codes for those wastes removed and transported off-site for treatment and/or disposal;
 - b. The total volume of each waste type removed from each unit;
 - c. The final destination and disposition (i.e., landfill, incinerator, treatment, etc.) of the waste; and
 - d. Copies of the waste manifest for each shipment of waste.

Any discrepancies between the volumes of hazardous waste remaining in the unit at the time of final approval (or final receipt) and volumes of hazardous wastes listed in waste manifests should be discussed in this section of the Closure Documentation Report.

2. Information Regarding the Procedures used to Decontaminate all Structures and Equipment - a description of the methods and procedures used to decontaminate all structures and equipment contaminated with hazardous wastes through waste management unit operations or closure activities, including:
 - a. A description of the structures and equipment which were decontaminated;
 - b. A description of the procedures and equipment used to decontaminate the structures and equipment identified in Item a. above;

- c. Identification of the volume of wastes generated through decontamination activities. The term "wastes" includes waste residues, decontamination wash and rinse waters, contaminated disposable equipment, etc.;
 - d. A description of the waste characterization of the wastes generated through decontamination activities, including the designated EPA Hazardous Waste Code; and
 - e. The methods and procedures of on-site management of wastes generated through decontamination activities. The following items should be addressed:
 - i. the final destination and disposition (i.e., landfill, treatment, incineration, etc.) of the waste; and
 - ii. copies of the waste manifests for each shipment of waste off-site.
3. Information Regarding any Required Integrity Evaluation - If an integrity evaluation is required as part of closure, then information regarding this evaluation must be provided in the closure documentation report. At a minimum, the following should be provided:
- a. a description of the procedures used to conduct the evaluation, including reference to the actual method used;
 - b. the results of the inspection;
 - c. scaled drawings showing the location of all cracks and construction joints observed during the investigation;
 - d. conclusions reached regarding any cracks or construction joints observed in the areas of concern;
 - e. justification for the conclusions reached (e.g., information must be provided which indicates that any construction joints in the areas of concern are indeed watertight); and
 - f. photographs to support the conclusions reached.
4. Information Regarding All Sampling and Analysis Efforts - descriptions of the methods, procedures, and results of all decontamination wipe sampling/analysis and soil sampling/analysis including the following information:
- a. identification of the reason for the sampling/analysis effort and the goals of the effort;

- b. a summary in tabular form of all analytical data, including all quality assurance/quality control data;
 - c. the location from which all soil samples were collected including the sample depth interval with respect to ground surface;
 - d. a scaled drawing showing the location from which all soil samples were collected;
 - e. a description of the sampling procedures, sample preservation procedures and chain of custody procedures;
 - f. identification of the test method used and detection limits achieved, including sample preparation, sample dilution (if necessary) and analytical interferences;
 - g. copies of the final laboratory report sheets, including final sheets reporting all quality assurance/quality control data and chain of custody reports;
 - h. a summary of all procedures used for quality assurance/quality control, including the results of these procedures; and
 - i. a discussion of the data as it is related to the overall goal of the sampling/analysis effort.
5. Information Regarding Excavation/Soil Removal Efforts - descriptions of excavation/soil removal efforts conducted at each unit in order to comply with the requirements of the approved closure plan and RCRA closure standards. The following information should be included at a minimum:
- a. a description of excavation/soil removal procedures including equipment used;
 - b. a description of the horizontal and vertical extent of the excavation;
 - c. identification of the volume of soil and other material removed;
 - d. a description of how excavated material was managed including sampling and analytical efforts to classify the material for disposal (specific references can be made to information related to waste management activities presented in accordance with Item 2.5.1 above);

- e. scaled drawing(s) which indicate the horizontal and vertical extent of soil excavation Clean Harbors of Chicago activities; and
 - f. photographs documenting excavation activities.
6. Final Conclusions Regarding the Closure Activities - a summary and evaluation of the information provided in Items 1-4 above should be presented. This summary/evaluation should identify how and why the information provided above sufficiently demonstrates that the unit was closed in accordance with the approved plan.

2.6 Closure Cost Expenditures

A complete and detailed chronological summary of the closure activities and their respective cost should be provided within the closure documentation report. This closure cost summary should provide the total cost of closure of the subject waste management unit(s). Upon submission of final closure certification documentation for the facility, a request for release of financial assurance (if necessary) should be included in this section of the report.

2.7 Color Photo Documentation

Color photo documentation of closure activities performed for each of the subject waste management units for which closure is being certified should be included in the documentation report. Photos should depict all relevant closure activities in chronological order and indicate activities and conditions at the waste management unit(s) before, during and after closure activities had been completed.

2.8 Report Certification

The closure documentation report must be accompanied by a certification which is signed by both the owner/operator and by any independent Illinois registered professional engineer. This certification must meet the certification requirements of 35 Ill. Adm. Code 702.126.

This certification document must include:

- 1. original signatures of the owner/operator and the overseeing independent professional engineer;
- 2. date of signatures; and
- 3. stamp of the certifying engineer.

2.9 Closure Certification Report Submission

The original with all attachments and certifications and two copies of the closure documentation report with all certifications should be mailed to the following address:

Illinois Environmental Protection Agency
Division of Land Pollution Control
Permit Section
2200 Churchill Road
Post Office Box 19276
Springfield, Illinois 62794-9276

TF\mls\963472S.WPD



ENVIRONMENTAL SERVICES, INC.

325 WOOD ROAD, P.O. BOX 327 • BRAINTREE, MA 02184
(617) 849-1800

Certified Mail - Return Receipt Requested

Z 238 294 622

October 27, 1995

Mr. James Moore
Illinois Environmental Protection Agency
Division of Land Pollution Control -- #24
Permit Section
2200 Churchill Road
Post Office Box 19276
Springfield, IL 62794-9276

Re: Clean Harbors of Chicago, Inc.
Log No. C-742
Closure Decontamination Report

Dear Mr. Moore:

In accordance with the conditions of the Illinois Environmental Protection Agency (IEPA) letter dated October 31, 1994, Clean Harbors of Chicago, Inc. (CHCI) is pleased to submit this Closure Documentation Addendum Report for hazardous waste and/or PCB decontamination/closure activities undertaken at the CWM Chemical Services, Inc. (CWMCSI) facility in Chicago, IL.

This Addendum Report is submitted as a follow-up to the Closure Documentation Report submitted previously to the Agency under cover letter dated June 29, 1995. The Addendum Report describes the decontamination and/or partial closure of two Outdoor Container Storage Areas (Unit 49) located at the northwest corner and west side of the Tank Farm

Today's submittal includes three (3) copies of a bound summary report (Volume 1 -- the Addendum Report) and one (1) set of supporting documentation (Volume 2). As previously agreed, only one copy of the supporting documentation (e.g., manifests, laboratory data sheets, etc.) is being submitted with the summary report due to excessive volume of paperwork. Additional copies of the supporting documentation shall be furnished upon request. Please note that one copy of the CDR is marked as "original" and contains the closure certification document with the original signatures of the facility owner/operator and the independent professional engineer overseeing the closure activities.



Mr. James Moore, IEPA
October 27, 1995
Page 2

If you have any questions, please feel free to contact me at (617) 849-1800, extension 4473.

Sincerely,

A handwritten signature in cursive script that reads "Paul A. Ahearn".

Paul A. Ahearn
Manager, Regulatory Compliance

Enclosures

cc: ✓ Anton Martig, USEPA (Letter and CDR Report only) (Z 238 294 623)
Robert LaBoube, CWMCSI (Letter and CDR Report only) (Z 238 294 624)
Stephen Pozner, V. P., Compliance and Health & Safety, CHESI



ENVIRONMENTAL SERVICES, INC.

1501 WASHINGTON STREET • P.O. BOX 850327 • BRAINTREE, MA 02185-0327
(617) 849-1800

Certified Mail - Return Receipt Requested P 263 032 074

June 17, 1996

Mr. Edwin C. Bakowski, P.E.
Manager, Permit Section
Bureau of Land
Illinois Environmental Protection Agency
2200 Churchill Road
Post Office Box 19276
Springfield, IL 62794-9276

Re: Clean Harbors of Chicago, Inc.
Site Closure Activities - Request for Second Extension

Dear Mr. Bakowski:

Clean Harbors of Chicago, Inc. (CHCI) is in receipt of the Agency's June 10, 1996 letter extending the due date for additional information regarding the closure documentation report for closure activities conducted by CHCI at the former CWM Chemical Services, Inc. portion of the CHCI hazardous waste facility.

Please note that during a teleconference held on June 13, 1996 with Mr. Jim Moore of your staff, I requested a second extension of the due date for closure information on the Building 26-43 conveyer system, and the fire suppression system. The second request was made because I experienced a serious back injury in early May and was unable to return to the office until June 10th. Mr. Moore agreed to an additional 4-week extension, with a new due date of July 11, 1996.

Your assistance and cooperation in this matter is greatly appreciated. If you have any questions, please do not hesitate to contact me at (617) 849-1800, extension 4473.

Sincerely,

Paul A. Ahearn
Director, Regulatory Compliance

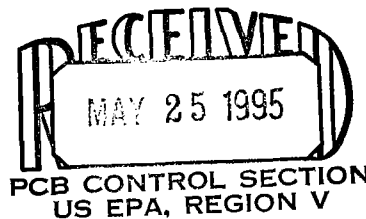
Attachment

cc: Anton Martig, U.S. EPA Region V (Certified Mail P 263 032 075)



ENVIRONMENTAL SERVICES, INC.

1200 CROWN COLONY DRIVE, P.O. BOX 9137 • QUINCY, MA 02269-9137
(617) 849-1800



Via Facsimile (Certified Mail - Return Receipt requested Z 763 608 006)

May 22, 1995

Mr. Robert Watson, P.E.
Illinois Environmental Protection Agency
Division of Land Pollution Control -- #24
Permit Section
2200 Churchill Road
Post Office Box 19276
Springfield, IL 62794-9276

Re: Clean Harbors of Chicago, Inc.
Log No. B-16-M-2
Request for Extension: Closure Approval & Temporary Authorization

Dear Mr. Watson:

On October 31, 1994, the Illinois Environmental Protection Agency (IEPA) issued a RCRA Partial Closure Approval to Clean Harbors of Chicago, Inc. (CHCI) to undertake certain decontamination and closure activities at the CWM Chemical Services, Inc. (CWMCSI) hazardous waste facility in Chicago, IL. Condition 1 of the Approval Letter states that the partial closure activities must be completed by May 1, 1995. However, Condition 1 also states that the completion date may be revised if CHCI finds that additional time is necessary to complete all required activities.

On November 22, 1994, the IEPA issued to CHCI a Temporary Authorization (TA) to construct/modify certain waste management assets at the CWMCSI facility in anticipation of a modified RCRA Part B permit. Under the terms of the TA, the approval to conduct the construction activities expires 180 days from the date of the letter, i.e., on May 22, 1995.

As I explained earlier today, this letter is to formally request an extension of the partial closure and TA authorizations. As you know, decontamination/closure and construction activities have been on-going since last November. As of this date, closure activities have been completed in all areas with the exception of two (2) outdoor storage areas at the northwest corner of the tank farm, and construction activities are approximately 75% complete. Barring unforeseen occurrences, CHCI expects that all partial closure and construction activities shall be completed on or by June 9, 1995.



Mr. Robert Watson/IEPA
May 22, 1995
Page 2

If you have any questions regarding this request, please do not hesitate to contact me at (617) 849-1800, extension 4473.

Sincerely,

A handwritten signature in black ink that reads "Paul A. Ahearn". The signature is written in a cursive, flowing style with a long horizontal stroke extending to the right.

Paul A. Ahearn
Manager, Regulatory Compliance

cc: Stephen Pozner, V.P., Compliance and Health & Safety, CHESI
Anton Martig, USEPA (Certified Mail Z 763 608 007)



State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/524-3300

October 31, 1994

Mr. Paul Ahearn
Clean Harbors Environmental Services
1200 Crown Colony Drive
P.O. Box 9137
Quincy, Massachusetts 02269-9137

RE: 0316000051 - Cook County
Clean Harbors of Chicago
ILD000608471
Log No.: C-742
Received: August 26, 1994
RCRA Closure

Dear Mr. Ahearn:

This letter is in response to the document entitled "Decontamination/Closure Plan, CWM Chemical Services, Inc.", dated August 24, 1994, and received by the Agency on August 26, 1994. This document was prepared and submitted by Clean Harbors Environmental Services. The subject submittal was reviewed as an interim status closure plan due to the fact that it proposed closure activities for some of the hazardous waste management units located on the former CWM Chemical Services operating site. The partial RCRA interim status closure plan for the two hazardous waste management tank systems designated T-108 and T-111(2 S02 units), the hazardous waste Drum Shredder and Crusher Unit (T04) located within Building 43, and the hazardous waste Shredder and Roller Conveyor Unit (T04) located within Building 26 at the above referenced facility are hereby approved, subject to the following conditions and modifications (it is understood that some of the requirements associated with these conditions and modifications may have already been met):

1. Closure activities must be completed by May 1, 1995. When closure is complete, the owner or operator must submit to the Agency certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. This certification must be received at this Agency within sixty (60) days after closure, or by July 1, 1995. These dates may be revised if Clean Harbors finds that additional time is necessary to complete all required closure activities and demonstrates to the Agency that it is attempting to complete closure in a timely manner.

The attached closure certification form must be used. Signatures must meet the requirements of 35 Ill. Adm. Code Section 702.126. The independent engineer should be present at all critical, major points (activities) during the closure. These might

include soil sampling, soil removal, backfilling, final cover placement, etc. the frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity. Financial assurance must be maintained for the units approved for closure herein until the Agency approves the facility's closure certification.

The Illinois Professional Engineering Act (Ill. Rev. Stat., Ch. 111, par 5101 et. seq.) requires that any person who practices professional engineering in the State of Illinois or implies that he (she) is a professional engineer must be registered under the Illinois Professional Engineering Act (par. 5101, Sec.1). Therefore, any certification or engineering services which are performed for a closure plan in the State of Illinois must be done by an Illinois P.E.

Plans and specifications, designs, drawings, reports, and other documents rendered as professional engineering services, and revisions of the above must be sealed and signed by a professional engineer in accordance with par. 5119, Sec.13.1 of the Illinois Professional Engineering Act.

As part of the closure certification, to document the closure activities at your facility, a Closure Documentation Report must be submitted which includes the following:

- a. The volume of waste, waste residue and contaminated soil (if any) removed. The term waste includes waste resulting from decontamination activities.
- b. Scaled drawings showing the horizontal and vertical boundaries of the extent of any soil removal effort.
- c. A description of the method of waste handling and transport.
- d. The waste manifest numbers.
- e. Copies of the waste manifests.
- f. Information documenting the results of all sampling/analysis efforts. The goal of presenting this information should be to describe, in a logical manner, the activities and results associated with the sampling/analysis effort. At a minimum, this information must be formatted in accordance with, and contain the information described, in Condition 9. below.
- g. Color photo documentation of closure. Document conditions before, during and after closure.

- h. A chronological summary of closure activities and the cost involved.

The original and two (2) copies of all certifications, logs, or reports which are required to be submitted to the Agency by the Facility should be mailed to the following address:

Illinois Environmental Protection Agency
Bureau of Land - #33
Permit Section
2200 Churchill road
Post office Box 19276
Springfield, Illinois 62794-9276

2. The approval of this closure plan for the two hazardous waste tank systems and the two drum treatment units in no way approves or disapproves closure plans as they relate to the remaining hazardous waste management units located at the former CWM Chemical Services operation facility. Prior to initiating closure activities for those hazardous waste management units which are not closing at this time, closure plans must be submitted to and approved by the Agency.
3. The proposed decontamination methods for the two tank systems undergoing closure and the drum crusher/ shredder units are acceptable to the Agency provided that, subsequent to final sludge removal and solvent wash for the tank units, the interiors of the tank units and all surfaces of the Building 43 drum crusher/shredder unit exposed to hazardous wastes/hazardous constituents are pressure washed with a detergent solution, and rinsed. The intent of the additional wash is to remove residues of the solvent wash which may cause a compatibility problem with hazardous wastes or non-hazardous wastes which are to be stored in the tank units in the future. This additional decontamination effort will also allow Clean Harbors to achieve compliance with the RCRA closure standard of decontaminating structures potentially contaminated with hazardous wastes/hazardous constituents.

If Clean Harbors can demonstrate that these units were previously decontaminated in a manner similar to that described above, no additional decontamination efforts will be necessary for those units. Information to make such a demonstration must be provided in the report required by Condition 9 below.

4. All piping and appurtenant structures decommissioned as part of this closure effort must be decontaminated prior to re-use or sending for metals reclamation. This decontamination effort shall consist of (1) removal of any gross contamination, (2) washing the exterior with a detergent solution and then rinsing, and (3) flushing the interior with a detergent solution with a final rinse with water.

Decontamination of the tanks, crusher/shredder unit, piping and appurtenant structures associated with closure activities is not necessary if such equipment is disposed in a permitted TSCA/RCRA authorized landfill or incinerator. If this manner of disposal is chosen, these materials must comply with all TSCA/RCRA requirements (e.g., "land-ban" treatment standards) prior to disposal.

5. The proposed PCB cleanup objectives for the tank systems and the Building 43 drum crusher/shredder unit is acceptable to the Agency. Decontamination efforts for all interior surfaces of the tank units, and on all surfaces exposed to hazardous waste/hazardous constituents for the drum crusher/shredder unit must achieve the objective of 10 ug/100 cm² PCBs (based on a wipe test). A report documenting that this cleanup objective has been achieved for all units subject to this closure plan must be developed in accordance with Condition 9. below.
6. All wastes generated and/or derived from the subject closure activities at the site (e.g., decontamination wash and rinse waters, personal protective equipment, etc.) meet the definition of Pollution Control Waste and Industrial Waste in accordance with 35 Ill. Adm. Code part 809, and therefore are subject to regulation as Special Wastes. Clean Harbors must collect these wastes for adequate characterization to determine if these wastes are listed or characteristically hazardous wastes, including a determination of whether these wastes are "derived-from" hazardous wastes. If it is determined that these wastes are indeed hazardous, they must be managed in accordance with the applicable requirements of 35 Ill. Adm. Code Subtitle G. If these wastes are determined to be non-hazardous, they must be managed as special waste in accordance with 35 Ill. Adm. Code Subtitle G.
7. The decontamination and removal activities for the Building 26 Drum Crusher/Shredder units as outlined by this approved closure plan do not supersede any requirements for closure and/or decontamination of the Building 26 interior and pavement. At the time of RCRA closure of the Building 26 container storage areas, additional requirements regarding decontamination of the building interior and/or pavement may be required in accordance with the facility's RCRA Part B permit.
8. All wipe samples collected must be conducted in accordance with SW-846 or equivalent procedures. All quality assurance/quality control protocol as required under SW-846 for such sampling must be followed, including proper sample collection preservation, handling and transportation, including chain-of-custody. All wipe samples collected must be analyzed in accordance with Condition 12. below.
9. A report must be submitted to the Agency documenting the results of (1) the tank decontamination wipe sampling and analysis by February 1, 1995. This report must contain the following information:

- a. identification of the reason for the sampling/analysis effort and the goals of the effort;
 - b. a summary in tabular form of all analytical data, including all quality assurance/quality control data;
 - c. a scaled drawing showing the location from which all samples were collected;
 - d. a description of the sampling procedures, sample preservation procedures and chain of custody procedures;
 - e. identification of the test method used and detection limits achieved, including sample preparation, sample dilution (if necessary) and analytical interferences;
 - f. copies of the final laboratory report sheets, including final sheets reporting all quality assurance/quality control data;
 - g. a summary of all procedures used for quality assurance/quality control, including the results of these procedures; and
 - h. a discussion of the data as it is related to the overall goal of the sampling/analysis effort.
10. Quality assurance/quality control procedures which meet the requirements of SW-846 must be implemented during all required sampling/analysis efforts, including wipe sampling/analysis procedures. Along with the sampling and analysis report required in accordance with Condition 10. above, Clean Harbors must submit a completed copy of the laboratory certification document, provided as an attachment to this letter, for these analytical events.
11. All soil samples shall be analyzed individually (i.e., no compositing). Analytical procedures shall be conducted in accordance with Test Methods for Evaluating Solid Waste, Third Edition (SW-846). When a SW-846 (Third Edition) analytical method is specified, all of the chemical listed in the Quantitation Limits Table for that method shall be reported unless specifically exempted in writing by the Agency. Apparent visually contaminated material within a sampling interval shall be included in the sample portion of the interval to be analyzed. To demonstrate that a parameter is not present in a sample, analysis results must show a detection limit at least as low as the RCRA Groundwater Detection Limits, as referenced in SW-846 (Third Edition) Volume A, pages TWO-29 and TWO-30, Table 2-15. Each wipe sample collected must be analyzed for:

* PCBs by Method 8080;

All soil samples collected must be analyzed for:

* 35 Ill. Adm. Code Part 724, Appendix I constituents.

12. Shallow soil sampling and analysis to determine proper waste characterization of soils to be excavated during construction activities must be conducted in accordance with the terms, conditions and requirements of the Agency approval letter dated August 16, 1994. A report documenting the results of the sampling and analysis of shallow soils must be developed in accordance with Condition 9. below, and submitted to the Agency for review by no later than February 1, 1995.
14. The procedures for closing the outdoor hazardous waste container storage units designated in the approved closure plan, as discussed by Clean Harbors and Agency representatives on September 12, 1994, is acceptable to the Agency. All asphalt surfaces of these units must be removed, with underlying soil excavated to depths required for the construction ongoing at the site. The excavated materials (i.e., asphalt and soils) must be managed as a hazardous waste.

Should it be determined that the remaining soils underlying the hazardous waste container storage areas are contaminated, additional investigative efforts may be coordinated with the corrective action activities for the Process Area. Should Clean Harbors pursue this option, the Agency must be notified in writing within the closure certification documentation report required by Condition 1. above.

14. If removal and off-site disposal is the remedial action chosen for the soils excavated in accordance with the pre-construction activities approved by the Agency in an August 16, 1994, letter, then all contaminated soil which is excavated for off-site disposal must be managed as 35 Ill. Adm. Code Part 721 F001-F003, U169, and U019 hazardous waste in accordance with 35 Ill. Adm. Code 722, 723, 728 and 809, as well as all applicable federal requirements. All excavated soils transported off-site for disposal must be manifested under Illinois Waste Stream Permit Authorization No. 591480, and transported to the CWM-CID #1 hazardous waste landfill for proper disposal.
15. If Clean Harbors determines that soil excavation and off-site disposal is not the preferred remedial action for this closure, then the Agency must be notified in writing when such a determination is made. At that time, the Agency will provide Clean Harbors with additional guidance regarding the information which must be submitted to the Agency for review and approval relative to the alternative remedial action which the facility would like to implement.


16. To avoid creating another regulated storage unit during closure, it is recommended that you obtain any necessary permits for waste disposal prior to initiating excavation activities. If it is necessary to store excavated hazardous waste on-site prior to off-site disposal, do so only in containers or tanks for less than ninety (90) days. Do not create regulated waste pile units by storing the excavated hazardous waste in piles. The ninety (90) day accumulation time exemption (35 Ill. Adm. Code 722.134) only applies to containers and tanks.
17. If the Agency determines that implementation of this closure plan fails to satisfy the requirements of 35 Ill. Adm. Code 725.211 and 725.214, the Agency reserves the right to amend the closure plan. Revisions of closure plans are subject to the appeal provisions of Section 40 of the Illinois Environmental Protection Act.
18. Under the provisions of 29 CFR 1910 (51 FR 15,654, December 19, 1986), cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include Hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of three days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors must have at least an additional eight hours of specialized training on managing hazardous waste operations.
19. Please be advised that the requirements of the Responsible Property Transfer Act (Public Act 85-1228) may apply to your facility due to the management of RCRA hazardous wastes. In addition, please be advised that if you store or treat on-site generated hazardous waste in containers or tanks pursuant to 35 Ill. Adm. Code 722.134, those units are subject to the closure requirements identified in 35 Ill. Adm. Code 722.134 (a)(1).
20. All hazardous wastes that result from this project are subject to annual reporting as required in 35 Ill. Adm. Code 722.141 and shall be reported to the Agency by March 1 of the following year for wastes treated and left on-site or shipped off-site for storage, treatment and/or disposal during any calendar year. Additional information and appropriate report forms may be obtained from the Agency by contacting:

Facility Reporting Unit
Bureau of Land
Illinois Environmental Protection Agency
2200 Churchill Road
P.O. Box 19276
Springfield, Illinois 62794-9276

Mr. Paul Ahearn
Clean Harbors of Chicago
Page 8

Should you have any questions concerning this matter, please contact Eric Minder, P.E., at 217/524-3274.

Sincerely,



Harry A. Chappel, P.E.
Hazardous Waste Branch Manager
Permit Section , Bureau of Land

HAC:EM
JEM

cc: USEPA Region V - George Hamper



ENVIRONMENTAL SERVICES, INC.

1200 CROWN COLONY DRIVE, P.O. BOX 9137 • QUINCY, MA 02269-9137
(617) 849-1800

Via Federal Express

July 29, 1994

Mr. Douglas Clay, P.E.
Illinois Environmental Protection Agency
Division of Land Pollution Control -- #24
Permit Section
2200 Churchhill Road
Post Office Box 19276
Springfield, IL 62794-9276

Re: Clean Harbors of Chicago, Inc.
Class 3 Permit Modification Request

RECEIVED

AUG - 1 1994

IEPA-DLPC

Dear Mr. Clay:

In accordance with 35 IAC 703.283, Clean Harbors of Chicago, Inc. (CHCI), a hazardous waste storage and treatment facility located at 11800 South Stony Island Avenue in Chicago, IL hereby requests a Class 3 Permit Modification to its existing RCRA Part B permit issued November 4, 1993. CHCI seeks this Permit Modification in advance of a proposed acquisition of selected non-incinerator assets at the CWM Chemical Services Inc. (CWMCSI) hazardous waste facility in Chicago, Illinois.

As part of this proposed modification, CHCI would utilize certain non-incinerator assets as a "build-out" of activities already authorized under CHCI's Part B permit. In addition, CHCI would: decontaminate and dismantle the existing CWMCSI hazardous waste incinerator; implement the Hazard and Operability Study and Phase II fire protection recommendations/upgrades at the CWMCSI facility; and assume responsibility for RCRA Facility Investigation/Corrective Action and post-closure activities associated with the inactive CWMCSI surface impoundments

Specific modifications include:

- Storage of containers of hazardous waste in CWMCSI Buildings 25 and 26, and an overall drum storage increase from 1,875 to 2,919 55-gallon drums or equivalent;
- Upgrading and utilization of the existing CWMCSI tank farm and containment structure in lieu of constructing a new tank farm system, and an overall tank storage increase from 244,140 gallons in 28 tanks to 255,530 gallons in 30 tanks;
- Relocating the approved Pegasus fuels blending system to CWMCSI Building 43 in lieu of constructing a new building;



Mr. Douglas Clay/IEPA
July 29, 1994
Page 2

- Upgrading the existing CWMCSI rail containment system to provide rail storage/staging for up to 60,000 gallons of hazardous waste in two railcars;
- Upgrading existing and proposed truck parking areas to provide containment for up to 194,400 gallons of hazardous waste stored in 27 highway transporters;
- Treatment of D002 (Corrosive) liquid hazardous waste in containers and tanks by the commingling/mixing of compatible waste streams to adjust pH value;
- treatment of organic peroxide hazardous waste in containers through the addition of water;
- Treatment of acid cyanide hazardous waste in containers through pH adjustment using sodium hydroxide or other alkaline materials; and
- Treatment of hazardous waste in containers and tanks by phase separation using physical (e.g., gravity separation, filtration) and chemical (e.g., addition of demulsifiers) techniques.

The modifications contemplated by CHCI will involve physical modifications to the existing CWMCSI structures and/or changes in the approved CHCI facility RCRA Part B management plans. In accordance with 35 IAC 703.283(a)(4), CHCI has prepared a revised RCRA Part B application entitled "Request for Permit Modification". The application, which is marked with revision date "07/15/94" consists of a 6-volume set that has been submitted to IEPA under separate cover.

In accordance with 35 IAC 703.282(b), CHCI shall send a notice of this modification request to all persons on the facility's mailing list, and shall publish a notice in a newspaper of general circulation within seven (7) days of the date of this request. A copy of the Application will be made available for public viewing at the Olive Harvey College Library at 10001 South Woodlawn Avenue in Chicago, IL.

Clean Harbors appreciates the Agency's time and assistance in this matter. If you have any questions regarding, please do not hesitate to contact me at (617) 849-1800, extension 4473.

Sincerely,

A handwritten signature in cursive script that reads "Paul A. Ahearn".

Paul A. Ahearn
Manager, Regulatory Compliance

Attachments

cc: Stephen Pozner, V.P., Compliance and Health & Safety, CHESI

Clean Harbors

ENVIRONMENTAL SERVICES, INC.

1200 CROWN COLONY DRIVE, P.O. BOX 9137 • QUINCY, MA 02269-9137
(617) 849-1800

Via Fascimile and
Certified Mail - Return Receipt Requested

August 24, 1994

Mr. Douglas Clay, P.E.
Illinois Environmental Protection Agency
Division of Land Pollution Control -- #24
Permit Section
2200 Churchill Road
Post Office Box 19276
Springfield, IL 62794-9276

Re: Clean Harbors of Chicago, Inc.
Log No. B-16-M-2
Proposed Decontamination/Closure Plan

Dear Mr. Clay:

Clean Harbors of Chicago, Inc. (CHCI) has prepared and is pleased to submit the attached decontamination/closure plan for your review and approval.

The plan describes the decontamination, dismantling, disposal, and/or reuse of certain waste management units and associated equipment at the CWM Chemical Services, Inc. (CWMCSI) facility at 11700 South Stony Island Avenue in Chicago, IL. The decontamination/closure activities described in the plan are a necessary first step to enable CHCI to perform a series of health and safety construction upgrades which are described in detail in CHCI's August 11, 1994 request to the Agency. The upgrades are being made by CHCI in anticipation of the issuance of a modified Part B Permit which shall allow CHCI to own and operate non-incinerator assets at the CWMCSI facility.

This plan has been prepared to comply with applicable RCRA and TSCA decontamination/closure requirements, specifically 35 IAC 725.219 for RCRA interim status hazardous waste management units, and 40 CFR 761.79 and 761.120 for equipment/structures contaminated with polychlorinated biphenyls (PCB's). A copy of this plan is being submitted to Mr. Anton Martig of US EPA Region V under separate cover.



Mr. Douglas Clay, P.E./IEPA
August 24, 1994
Page 2

If you have any questions, please do not hesitate to contact me at
(617) 849-1800, extension 4473.

Sincerely,

A handwritten signature in cursive script that reads "Paul A. Ahearn".

Paul A. Ahearn
Manager, Regulatory Compliance

Attachment

cc: Stephen Pozner, V.P., Compliance and Health & Safety, CHESI